

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

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| |) | |
| |) | |
| LANGEMAN MANUFACTURING, LTD., |) | |
| |) | |
| Plaintiff, |) | Civil Action No. 07-C-0411-C |
| |) | |
| v. |) | Judge Barbara B. Crabb |
| |) | |
| PINNACLE WEST ENTERPRISES, INC., |) | JURY TRIAL DEMANDED |
| RHINO LININGS USA, INC., TRIM TAPE, |) | |
| INC., ULTIMATE LININGS LTD., VORTEX |) | |
| SPRAYLINERS, INC., ZEFR COMPOSITES, |) | |
| INC., ZIEBART INTERNATIONAL CORP., |) | |
| BALLWEG CHEVROLET, INC., D&J |) | |
| SERVICE CENTER, DOUBLE G COLLISION |) | |
| CLINIC, L.L.C., JONES CHEVROLET-BUICK- |) | |
| PONTIAC-CADILLAC, INC., KING |) | |
| KOLLISION, L.L.C., KUNES COUNTRY |) | |
| CHEVROLET-CADILLAC, INC., MONROE |) | |
| TRUCK EQUIPMENT, INC., and ZIEBART'S |) | |
| RHINO LINING – JANESVILLE, |) | |
| |) | |
| Defendants. |) | |

**VORTEX SPRAYLINERS, INC.'S ANSWER TO
LANGEMAN MANUFACTURING, LTD.'S COMPLAINT**

Defendant Vortex Sprayliner, Inc. ("Vortex") by and through its undersigned counsel, respectfully submits this Answer in response to the Complaint for Damages and Injunctive Relief submitted by Plaintiff Langeman Manufacturing, Ltd. ("Langeman").

NATURE OF THE ACTION AND JURISDICTION

1. Vortex admits that the Complaint purports to state a claim for patent infringement, and that the District Court has subject matter jurisdiction over patent infringement actions pursuant to 28 U.S.C. §§ 1331 and 1338(a). Vortex lacks sufficient information to admit or deny whether diversity jurisdiction is present under 28 U.S.C. § 1332, and therefore denies same.

2. Vortex admits that it conducts business in this judicial district, and does not contest personal jurisdiction. Vortex denies that it has made, offered to sell, sold, and/or continued to sell infringing products, practiced infringing methods, or purposely shipped products which infringe or are used to infringe Plaintiff's patent rights. Vortex admits that Defendant D&J Service Center regularly conducts business in this judicial district. As to the remaining Defendants, Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

3. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

PARTIES

4. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

5. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

6. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

7. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

8. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

9. Admitted.

10. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

11. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

12. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

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17. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

18. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

19. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

THE PATENTS-IN-SUIT: U.S. PATENT NOS. 6,284,319 B1; 6,875,469 B2; and 7,014,900

20. Vortex admits that a copy of U.S. Patent No. 6,284,319 B1 (“the ‘319 patent”), entitled “Edge Trimming Tape and Method of Manufacture” and showing an issue date of September 4, 2001, is attached as Exhibit A to the Complaint. Vortex denies the remaining allegations in this paragraph.

21. Vortex admits that a copy of U.S. Patent No. 6,875,469 B2 (“the ‘469 patent”), entitled “Edge Trimming Tape and Method of Manufacture” and showing an issue date of April 5, 2005, is attached as Exhibit B to the Complaint. Vortex denies the remaining allegations in this paragraph.

22. Vortex admits that a copy of U.S. Patent No. 7,014,900 B2 (“the ‘900 patent”), entitled “Edge Trimming Tape and Method of Manufacture” and showing an issue date of March 21, 2006, is attached as Exhibit C to the Complaint. Vortex denies the remaining allegations in this paragraph.

23. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

LANGEMAN MANUFACTURING

24. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

25. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

26. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

27. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

28. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

29. Denied.

30. Vortex admits that the quoted language appears in Exhibit D to the Complaint. Vortex lacks sufficient information to admit or deny the remaining allegations in this paragraph, and therefore denies them.

31. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

32. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

33. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT PINNACLE

34. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

35. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

36. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

37. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

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46. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT RHINO

47. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

48. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

49. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

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60. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

61. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT TRIM TAPE

62. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

63. Admitted.

64. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

65. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

66. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

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75. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

76. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT ULTIMATE LININGS

77. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

78. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

79. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

80. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

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91. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

92. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT VORTEX

93. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

94. Denied.

95. Vortex admits that it sells and offers for sale filament-bearing tape in this district and elsewhere in the United States, and that it uses filament-bearing tape in the United States. Vortex denies the remaining allegations of this paragraph.

96. Denied.

97. Denied.

98. Admitted.

99. Vortex admits that a portion of its website is a secure site that prompts users for a username and password, and that Vortex dealers can access the website to purchase filament-bearing tape. Vortex denies the remaining allegations of this paragraph.

100. Denied.

101. Denied.

102. Denied.

103. Denied.

104. Denied.

105. Denied.

106. Denied.

CLAIMS FOR RELIEF AGAINST DEFENDANT ZEFR

107. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

108. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

109. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

110. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

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119. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

120. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

121. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT ZIEBART

122. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

123. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

124. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

125. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

126. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

127. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

128. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

129. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

130. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

131. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

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134. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

135. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

136. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT BALLWEG

137. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

138. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

139. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

140. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

141. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

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143. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

144. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT D&J

145. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

146. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

147. Admitted.

148. Admitted.

149. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

150. Denied.

151. Denied.

152. Denied.

CLAIMS FOR RELIEF AGAINST DEFENDANT DOUBLE G

153. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

154. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

155. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

156. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

157. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

158. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

159. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT JONES

160. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

161. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

162. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

163. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

164. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

165. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

166. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT KING KOLLISION

167. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

168. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

169. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

170. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

171. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

172. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

173. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT KUNES

174. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

175. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

176. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

177. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

178. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

179. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

180. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT MONROE

181. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

182. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

183. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

184. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

185. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

186. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

187. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

CLAIMS FOR RELIEF AGAINST DEFENDANT ZIEBART JANESVILLE

188. Vortex incorporates by reference its responses to the allegations stated in paragraphs 1-33 of the Complaint.

189. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

190. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

191. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

192. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

193. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

194. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

195. Vortex lacks sufficient information to admit or deny the allegations in this paragraph, and therefore denies them.

AFFIRMATIVE DEFENSES

FIRST DEFENSE

Vortex has not infringed, directly or indirectly, any valid claim of the '319 patent, '469 patent, or '900 patent.

SECOND DEFENSE

The asserted claims of the '319 patent, '469 patent, and '900 patent are invalid for failure to comply with one or more provisions of the patent laws and regulations of the United States set

forth in Title 35 of the United States Code, including but not limited to 35 U.S.C. §§ 101, 102, 103, and/or 112.

THIRD DEFENSE

Plaintiff's claims are barred, in whole or in part, by the equitable doctrine of laches.

FOURTH DEFENSE

Plaintiff's claims are barred, in whole or in part, by the equitable doctrine of estoppel.

FIFTH DEFENSE

Vortex reserves all affirmative defenses under Rule 8(c) of the Federal Rules of Civil Procedure, the Patent Laws of the United States and any other defenses, at law or in equity, that may now exist or in the future be available based on discovery and further factual investigation in this case.

PRAYER FOR RELIEF

WHEREFORE, Vortex respectfully prays for a judgment against Plaintiff as follows:

- (a) that Plaintiff take nothing by its Complaint in this action, and that the Complaint be dismissed with prejudice;
- (b) that the case be declared exceptional and that Vortex be awarded its costs, including reasonable attorney fees, incurred in this action;
- (c) that the Court grant Vortex such other relief as the Court deems just and proper.

September 14, 2007

Respectfully Submitted,

By: /s/ Thomas G. Pasternak

Thomas G. Pasternak
DLA Piper US LLP
203 N. LaSalle Street, Suite 1900
Chicago, Illinois 60601
Telephone: (312) 368-4000
Facsimile: (312) 236-7516

*Attorneys for Defendant Vortex
Sprayliners, Inc.*

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing VORTEX SPRAYLINERS, INC.'S ANSWER TO LANGEMAN MANUFACTURING, LTD.'S COMPLAINT, and the NOTICE OF APPEARANCE of Thomas G. Pasternak have been served, by U.S. Mail, upon the following individuals on this 14th day of September, 2007:

Attorney for Plaintiff:

Avelyn L. Ross
Vinson & Elkins LLP
The Terrace 7
2801 Via Fortuna, Suite 100
Austin, TX 78746-7568

Attorney for Defendant Pinnacle West Enters., Inc.:

Larry L. Satet
Attorney at Law
Two Prudential Plaza
180 North Stetson Avenue, Suite 2000
Chicago, IL 60601

**Attorney for Ballweg Chevrolet, Inc., King Kollision, L.L.C.,
and Rhino Linings USA, Inc.:**

Harold V. Johnson
Brinks Hofer Gilson & Lione
NBC Tower – Suite 3600
455 North Cityfront Plaza Drive
Chicago, IL 60611

Attorney for Trim Tape, Inc.:

Richard L. Bolton
Boardman, Suhr, Curry & Field
P.O. Box 927
Madison, WI 53701

**Attorney for Ziebart Int'l Corp.
and Ziebart's Rhino Lining – Janesville:**

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6630 Roxburgh, Suite 175
Houston, TX 77041

ZEFR Composites, Inc.
7656 Formula Place
San Diego, CA 92121

Double G Collision Clinic, LLC
105 Miner Way
Shullsburg, WI 53586

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2035 US Highway 14 East
P.O. Box 480
Richland Center, WI 53581

/s/ Thomas G. Pasternak